

# EXHIBIT 4

1  
2 UNITED STATES DISTRICT COURT  
3 EASTERN DISTRICT OF NEW YORK  
4 Index No. 1:19-cv-2987

5 -----x  
6 YELENA RUDERMAN,

7  
8  
9 Plaintiff,

10  
11 - against -

12  
13 LAW OFFICE OF YURIY PRAKHIN, P.C., and  
14 YURIY PRAKHIN, in both his individual and  
15 professional capacities,

16 Defendants.  
17 -----x

18  
19 November 13, 2020  
20 9:32 a.m.

21  
22 DEPOSITION of Defendant LAW  
23 OFFICE OF YURIY PRAKHIN, P.C., by IRENE  
24 RASKIN, pursuant to Fed. R. Civ. P.  
25 30(b)(6) Deposition Notice, taken by the  
Plaintiff, held via Zoom Video  
Conferencing, before Abner D. Berzon, a  
Registered Professional Reporter,  
Certified Realtime Reporter and Notary  
Public of the State of New York, via Zoom  
Video Conferencing.

1 RASKIN

2 record.)

3 BY MR. HARTZBAND:

4 Q. Ms. Raskin, so Ms. Larssen's and  
5 Ms. Belous's job duties were the same as  
6 any other paralegal, except they were  
7 assigned to Ms. Ruderman; right?

8 A. Correct.

9 Q. And Ms. Ruderman, just like any  
10 other attorney, was given discretion to  
11 assign tasks to paralegals as she saw fit;  
12 right?

13 A. Correct.

14 Q. Okay. We're gonna do another  
15 30(b)(6) topic, Ms. Raskin. The firm has  
16 designated you to testify on its behalf  
17 regarding employment benefits. Are you  
18 prepared to testify about that topic  
19 today?

20 A. Yes, I am.

21 Q. Ms. Ruderman received health  
22 insurance when she worked at the firm in  
23 2018; right?

24 A. Correct.

25 MR. HARTZBAND: Alright. I just

1 RASKIN

2 was probably toward -- in November, toward  
3 the end of November.

4 Q. Other than Mr. Prakhin, did you  
5 speak with anybody else about  
6 Ms. Ruderman's vision impairment? It's my  
7 understanding that it was more or less  
8 common knowledge around the office.

9 MS. DONNELLY: Objection. You  
10 can answer.

11 A. I'm sure people heard rumors  
12 about it, but, personally, I didn't speak  
13 to any employees at that time.

14 Q. Did you ever think about issuing  
15 Ms. Ruderman some kind of written notice  
16 to give you the medical records, since she  
17 had the verbal conversations, didn't  
18 result in her getting you what you wanted?

19 MS. DONNELLY: Objection. You  
20 can answer.

21 A. No, I didn't think of it.

22 Q. When she was down in Florida,  
23 did you ever remind her to make sure she  
24 got you the doctor's note?

25 A. No. She never called me

1 RASKIN

2 Florida. I didn't even know if she was in  
3 Florida or not. She said she's going and  
4 I believed her at that time, but that was  
5 the end of it.

6 Q. But now you think she was lying  
7 about that?

8 A. I'm not saying it. I don't know  
9 where she was. You asked me if she  
10 notified me from there. She never called  
11 me from Florida.

12 Q. What I asked you, if you ever  
13 reached out to her affirmatively if she  
14 was in Florida with a doctor, certainly it  
15 wouldn't have been a good time for her to  
16 get you a doctor's note; right? So I'm  
17 asking, did you ever remind her, while she  
18 was down there, to go get it for you?

19 A. No, I didn't. I think it's her  
20 responsibility to bring the notes. And if  
21 she didn't bring us one from New York, so  
22 why would I think that Florida note is  
23 more important one? I never thought about  
24 it.

25 Q. What about on any of the times

1 RASKIN

2 you knew she was going to a doctor in New  
3 York, did you remind her at that time to  
4 go get you a doctor's note?

5 A. Of course when she was advising  
6 me when she has an appointment and she's  
7 going to go, I also mentioned that don't  
8 forget to bring the note or diagnosis, or  
9 some kind of a medical term, so we will  
10 know what's going on with you."

11 Q. Did you ever speak to her about  
12 getting you a doctor's note over the  
13 phone?

14 A. I can't recall. I don't  
15 remember.

16 Q. Did Ms. Ruderman ever inform you  
17 that she would be out of the office to be  
18 in a doctor's appointment, for example, by  
19 calling you?

20 A. Yes.

21 Q. Did she call you on the office  
22 phone?

23 A. Probably.

24 Q. Right. Because Mr. Prakhin has  
25 a strict pretty strict policy against

1 RASKIN

2 personal cellphone use in the office;  
3 right?

4 A. Yes.

5 Q. And she ever text you to inform  
6 you that she'd be out of the office or in  
7 a doctor's appointment?

8 A. She mostly called me.

9 Q. And during any of those phone  
10 conversations, did you tell her, "Hey,  
11 make sure you get me that doctor's note,"  
12 or something to that effect?

13 A. Probably I did. I can't recall  
14 if it was verbal, in front of her, when  
15 she was in the office, or on the phone. I  
16 don't remember. But I was constantly  
17 asking her about those notes, doctor's  
18 notes.

19 Q. And you would typically ask for  
20 the doctor's notes around the time she was  
21 seeing doctors; correct?

22 A. Right.

23 Q. And oftentimes she told you she  
24 was out of the office seeing a doctor, by  
25 calling in?